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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

10 IVAN EARL BARNES,

11 Plaintiff,

12 v.

13 KILOLO KIJAKAZI, ACTING
14 COMMISSIONER OF SOCIAL SECURITY,

15 Defendant.

)
)
) CASE NO.
) 2:23-cv-00720-EJY

)
) **UNOPPOSED MOTION**
) **FOR EXTENSION OF TIME TO FILE**
) **PLAINTIFF'S BRIEF**

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17 Plaintiff, Ivan Earl Barnes, by his attorney, moves for a sixty (60) day extension of time
18 to file Plaintiff's opening brief. Plaintiff's opening brief is currently due to be filed July 31,
19 2023.
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1 Counsel requests this extension due to multiple, simultaneous filing deadlines. Counsel
2 requires additional time to properly and thoroughly prepare Plaintiff's brief. For instance,
3 between July 28, and September 22, 2023, staff in Counsel's office have two hundred and eleven
4 (211) Plaintiff briefs due. This figure does not include Oral Arguments, appeals to Circuit
5 Courts, Reply Briefs, settlement negotiations, and the various other tasks which arise throughout
6 the course of litigation. These circumstances do not allow for Plaintiff's Counsel to properly
7 prepare the brief by the current deadline. This request will not cause Defendant any undue
8 hardship. This extension is needed to thoroughly and properly prepare the brief.
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11 Wherefore, Plaintiff requests an extension from July 31, 2023, up to and including
12 September 29, 2023 to file their brief. Counsel for the Plaintiff has conferred with Defendant's
13 Counsel who kindly has no objection to this request.

14 Dated July 24, 2023.

15
16 Respectfully submitted,

17 /s/Hal Taylor
18 Hal Taylor, Esq.

19 IT IS SO ORDERED.

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23 UNITED STATES MAGISTRATE JUDGE
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25 DATED: July 24, 2023
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